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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

13 YVONN HEDMAN, an individual,
14
15 Plaintiff,

15 vs.

16 ALBERTSON'S, LLC, a Foreign Limited
17 Liability Company; DOE INDIVIDUALS 1
18 through 10; ROE CORPORATIONS 11
19 through 20; and ABC LIMITED LIABILITY
COMPANIES 21 through 30, inclusive,
20
21 Defendants.

CASE NO. 2:17-cv-02559-JAD-NJK

STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINE
DATES (SECOND REQUEST)

22 COME NOW, Plaintiff YVONN HEDMAN, by and through her attorneys BRIAN D.
23 NETTLES, ESQ., and WILLIAM R. KILLIP, JR., ESQ., and JENNIFER A. PETERSON, ESQ.,
24 of the NETTLES LAW FIRM; and Defendant ALBERTSON'S, LLC, by and through its
25 attorneys LEW BRANDON, JR., ESQ., and MATTHEW WHITTAKER, ESQ., of MORAN
26 BRANDON BENDAVID MORAN, and hereby submit the following Stipulation pursuant to
27 Local Rule 26-4. Based upon the following, the Parties request this Court extend all discovery
28

1 deadlines by sixty (60) days. This request is made in good faith and not to unduly delay the
2 proceedings.

3 **I. Local Rule 6-1**

4 Under LR 6-1(b) every stipulation to extend time must inform the court of any previous
5 extensions granted and state the reason for the extension requested.

6 **a. The Requirement of Local Rule 6-1 Are Satisfied**

7 This is the first request for extension filed by the parties. The parties are seeking this
8 extension in order to complete additional discovery that could not be completed during the time
9 allotted.

10 **II. Local Rule 26-4(a)**

11 Under LR 26-4(a) a statement specifying the Discovery completed:

- 12 a. Initial disclosures have been exchanged between all parties;
- 13 b. Written discovery has been expedited;
- 14 c. Defendant has scheduled the Deposition of Plaintiff March 26, 2018 at 11:00 a.m.;
- 15 and
- 16 d. Plaintiff are attempting to locate and depose Marsha Prince, former employee of
- 17 Defendant.

18 **III. Local Rule 26-4(b)**

19 Under LR 26-4(b) a specific description of the Discovery that remains to be completed:

- 20 a. The remaining Discovery to be completed is Plaintiff's deposition, FRCP 30(b)(6)
- 21 depositions of Defendant, Deposition of Defendant's former employee, Marsha
- 22 Prince, depositions of treating physicians, and disclosure and depositions of the
- 23 experts.

24 **IV. Local Rule 26-4(c)**

25 Under LR 26-4(c) the reasons why Discovery remaining was not completed within the
26 time limits set by the Discovery Plan:

- 27 a. Due to various scheduling conflicts, it has been impossible to conduct depositions
- 28 which must be completed prior to the disclosure of experts. Defendant unilaterally

noticed Plaintiff's depo for January 17, 2018; however, due to Plaintiff's counsel's trial calendar in January 2018, said deposition was continued to February 15, 2018. On February 15, 2018 all Parties appeared for Plaintiff's deposition but due to no fault of either party, a court reporter did not show up to the deposition and the court reporting service could not find an available reporter to send, at which point the Parties agreed to continue Plaintiff's Deposition. Due to further scheduling conflict, the deposition could not be scheduled again until March 26, 2018 which is only four (4) days before the current expert deadline. Accordingly, the parties need more time for initial expert reports.

V. Local Rule 26-4(d)

Under LR 26-4(d) a proposed schedule for completing all remaining Discovery:

a. Discovery cutoff dates:

Current date: May 29, 2018

Proposed date: July 30, 2018

b. Amending the Pleadings and Adding Parties:

Current date: December 29, 2017

Proposed date: No extension sought

c. Disclosures of Experts:

i. Initial expert disclosures:

Current date: March 30, 2018

Proposed date: May 29, 2018

ii. Rebuttal expert disclosures:

Current date: April 30, 2018

Proposed date: June 29, 2018

d. Interim Status Report:

Current date: March 30, 2018

Proposed date: May 29, 2018

...

1 e. Dispositive Motions:

2 Current date: June 29, 2018

3 Proposed date: August 28, 2018

4 f. Joint Pre-Trial Order:

5 Current date: July 30, 2018

6 Proposed date: September 28, 2018

7 Therefore, good cause existing, counsel jointly request that this Honorable Court allow
8 them the above proposed extended Discovery dates.

9
10 DATED this 8th day of March, 2018.

DATED this 8th day of March, 2018.

11 NETTLES LAW FIRM

MORAN BRANDON BENDAVID MORAN

12
13 By: /s/ Brian D. Nettles
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ORDER

Upon stipulation of counsel and good cause appearing therefore:

IT IS HERBY ORDERED that the *Stipulation and Order to Extend Discovery*
Deadline Dates (Second Request) is hereby approved. **NO FURTHER EXTENSIONS
WILL BE GRANTED.**

DATED March 12 _____, 2018.


UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

NETTLES LAW FIRM

By: /s/ Brian D. Nettles

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